



DEPARTMENT OF THE NAVY

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13 Jan 1997

Mr. Edwin C. Bakowski, P.E.
Manager, Permit Section
State of Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62794-9276

RCRA CLOSURE OF BUILDINGS 105, 415, AND 912 AT U.S. NAVY TRAINING
CENTER, GREAT LAKES, IL, SITE I.D. NO. 0971255004

Dear Mr. Bakowski:

This letter is in response to a meeting and site visit held at the U.S. Naval Training Center, Great Lakes on December 10, 1996. The Meeting was attended by representatives of the IEPA, US Navy and RUST Environmental (acting as consultant for the US Navy). The meeting was held to discuss RCRA closure of sites known as buildings 105, 415, and 912.

In order to achieve closure of the subject buildings the Navy intends on performing the following plan of action:

- Sampling of soil around buildings 105 and 415 in accordance with the attached meeting minutes.
- Sampling of soil around building 912 in accordance with IEPA letter of September 9, 1996.
- Determine the area in which a relatively impermeable barrier must be maintained at buildings 105, 415, and 912 in order to meet the requirements of paragraph 2 of the IEPA letter dated September 9, 1996.
- Sample groundwater as specified in paragraph 4 of the IEPA's letter dated September 9, 1996. It was noted during the site visit, that less than optimum sampling locations may have to suffice for this investigation due to physical constraints, such as the locations of existing buildings and underground utilities.
- Once the results of the groundwater sampling are known, petition the IEPA for Class II groundwater standards, TACO, or alternative standards with a groundwater management zone as applicable.

Currently, no further funding has been programmed to ~~complete~~ this effort. A request for funding is being prepared and will be submitted by the end of

February 1997. Naval Training Center Great Lakes is pursuing every available option to secure funding in a timely manner. Written, quarterly updates on the status of funding for this effort will be provided to your office, if total funding is not available. Once the funds have been received by my office the schedule will be as follows:

Award contract to conduct sampling 60 days after receipt of funds.
Issue analytical results to IEPA 90 days after completion of sampling

Should you have any comments or questions please call David Cabiness at (803) 820-7484 or E-mail at dmcabiness@efdsouth.navfac.navy.mil.

Sincerely,



DAVID CABINESS
Environmental Engineer
Hazardous Waste Branch

Copy to:
PWC Great Lakes (Kelly Devereaux)

**MEETING MINUTES
RCRA CLOSURE - GLNTC
CTO NO. 0050 - PROJECT NO. 20608**

A meeting was held on December 10, 1996, starting at 11:00 a.m. at Great Lakes Naval Training Center (GLNTC) offices with the following people in attendance:

<u>Name</u>	<u>Representing</u>	<u>Telephone No.</u>
David Cabiness	NAVY (SOUTHNAVFAC)	803-820-7484
Kelly Devereaux	NAVY (GLNTC)	847-688-2628
Marcia Lee	NAVY (GLNTC)	847-688-5995
Mark Schultz	NAVY (GLNTC)	847-688-4693
Vickie Broomhead	Illinois EPA	217-524-3285
Bill Sinnott	Illinois EPA	217-524-3310
Jason Martin	Rust	414-458-8711
Charlie Zeal	Rust	414-458-8711

The purpose of the meeting was to discuss the RCRA closure status of the three former hazardous waste container storage areas located at GLNTC Buildings 105, 415, and 912. In particular, the sampling requirements identified in the Illinois Environmental Protection Agency's (IEPA) September 9, 1996, letter (IEPA letter) and the Department of the Navy's October 17, 1996, letter (Navy letter) requesting modifications to those sampling requirements were the primary subjects of the meeting.

The following summarizes the meeting's discussions, activities, and conclusions.

1. Mr. Schultz opened the meeting with a summary of the progress made to date in the RCRA closure process at GLNTC. In particular, there are now only three former RCRA hazardous waste container storage areas at Buildings 105, 415, and 912 that need additional RCRA closure work. Mr. Schultz indicated that nothing has been budgeted yet for the additional RCRA closure work. The Navy will pursue the necessary funding, but he cautioned it may take awhile to obtain funding approval.
2. Mr. Zeal presented the Navy's desired approach to limit the amount of additional soil sampling outside of Buildings 105 and 415 since no hazardous waste storage or dry-cleaning related activities occurred outside of these buildings. The Navy would rather concentrate their investigation resources at those buildings on determining the extent of groundwater contamination. Mr. Sinnott indicated the IEPA would be receptive to reviewing such a proposal.
3. With respect to Building 105, it was preliminarily agreed that in lieu of the soil sampling

described in the September 9, 1996, IEPA letter, the only additional soil sampling necessary would be at three locations just outside the southeast corner of the building. Proposed soil sample collection locations are shown on the attached revised Figure 7-1. Beginning at the ground surface, field screening of soil will be performed using a photoionization detector (PID) with 2-foot depth intervals to the groundwater (depth to groundwater is approximately 10 feet). It is anticipated that soil sampling for laboratory analysis will start approximately at a depth of 6 feet. However, if field screening with the PID indicates contamination, additional soil samples at shallower depths may also be collected. The purpose of this soil sampling is to determine if the soil contamination detected inside the southeast corner of the building migrated laterally outside the footprint of the building. If soil contamination is detected outside the building that is not presently covered by asphalt or concrete pavement, additional pavement may need to be constructed. As observed during the site tour, the areas adjacent to Building 105 not currently paved are extremely limited.

4. With respect to Building 415, a reduced soil sampling strategy was preliminarily agreed to similar to that of Building 105 to investigate the potential for lateral migration outside Building 415 south of previous soil sample location GL95-415S-51. The two proposed soil sampling locations are shown on the attached revised Figure 7-3. As observed during the site tour, the entire area adjacent to Building 415 is paved.
5. With respect to future soil sampling at Building 912, it may not be possible to collect soil samples at depth approximately 10 feet to the northeast of sample location GL95-912S-102 due to the presence of underground utility conduits. This was illustrated during the site tour by the presence of utility markings and warning flags in the area. The same concern is noted for subsurface sampling near the transformer pad east of Building 912.
6. Ms. Broomhead indicated that the current groundwater cleanup objectives for the three sites are based on the 35 IAC 620 Class I groundwater standards. It is possible to request less stringent groundwater cleanup objectives (i.e., Class II groundwater standards, TACO, or alternative standards with a groundwater management zone, etc.), however, that process first requires the rate and extent of groundwater contamination to be estimated. Therefore, a request to revise the current groundwater cleanup objectives will not be prepared until more site-specific groundwater sampling information is available.
7. All in attendance, with the exception of Ms. Lee, went on a tour of Buildings 105, 415, and 912. The purpose of the tour was to give attendees an opportunity to view the current conditions inside, outside, and around the three buildings. Buildings 105 and 912 were observed to be in essentially the same condition and use as when sampling last occurred in January of 1996. Building 415, however, has been modified to a recreation center with video games, pool tables, and a large screen television viewing room. At the time of the January 1996 groundwater sampling, Building 415 was being used as a mini-mart store. This change in use should not impact RCRA closure activities.

8. At the conclusion of the tour, Mr. Sinnott requested that the Navy submit a letter to the IEPA presenting the revised soil sampling program for Buildings 105 and 415 as discussed during the meeting. Upon receipt of the letter, IEPA will respond to it and the Navy's October 17, 1996, letter at the same time in order to revise the soil sampling requirements presented in the IEPA's September 9, 1996, letter. It was agreed that Mr. Zeal would prepare the meeting minutes, including revised figures for Buildings 105 and 415, and that Mr. Cabiness would submit them to the IEPA with a cover letter requesting a revision to the RCRA closure soil sampling requirements for Buildings 105 and 415.
9. The meeting concluded at approximately 2:30 p.m.